COMMISSIONERS
JEFF HATCH-MILLER - Chairman
WILLIAM A. MUNDELL.
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

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BRIAN C. McNEIL EXECUTIVE SECRETARY

ARIZONA CORPORATION COMMISSION

July 26, 2005

Via Fax (w/o enclosures) & First Class Mail

Paul J. Roshka, Jr., Esq.
Roshka Heyman & DeWulf, PLC
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004

Joel Held, Esq. Baker & McKenzie, LLP 2300 Trammell Crow Center 2001 Ross Avenue Dallas, TX 75201 RECEIVED

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CORP COMMISSION

COMMENT CONTROL

Re: <u>Production of Panamanian Corporate Deed Translations</u>
In the matter of Yucatan Resorts, et al. (S-03539A-03-0000)

Dear Gentlemen:

Enclosed please find copies of the Panamanian Deeds entered in this proceeding and certified English translations of same. Included in this production is as follows:

- 1. Translated Panamanian documents pertaining to World Phantasy Tours, Inc. (Securities Division Exhibit Number S-56.1);
- 2. Translated Panamanian documents pertaining to Resort Holding International, S.A. (Securities Division Exhibit Number S-58.1); and
- 3. Translated Panamanian documents pertaining to Yucatan Resorts, S.A., (Securities Division Exhibit Number S-59.1).

Please be advised that the Securities Division is still considering whether to create a summary exhibit of significant or otherwise notable information from the various Panamanian

translations. Should this exhibit be created, the Division will convey further information to you about its production and disclosure at the appropriate time.

If you have any questions, please feel free to contact enforcement attorney Jamie Palfai or myself at (602) 542-4242.

Sincerely,

Karen Houle Legal Assistant

Karen Houle

KH/ds

cc: ALJ Marc Stern (w/ enclosures)
Docket Control x 13 (w/o enclosures)